

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DANNY R. TEAGLE and JESUS SALAZAR, JR., individually and on behalf of all others similarly situated,

Plaintiffs,

V.

**LEXISNEXIS SCREENING
SOLUTIONS, INC., formerly
known as CHOICEPOINT'S
WORKPLACE SOLUTIONS, INC.,**

Defendant.

No. 1:11-CV-1280-RWS-JSA

Jury Trial Demanded

**PLAINTIFF'S MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND RELATED ORDERS**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiff Danny R. Teagle moves for final approval of the class action settlement agreement reached between Plaintiff and Defendants. Plaintiff also moves the Court for orders related to the final approval of the settlement.

Specifically, Plaintiff requests:

1. An order granting final approval of the settlement in this action (“the Settlement”) on the terms and conditions set forth in the Settlement Agreement (the “Agreement”) and the Court’s Order Granting Preliminary Approval (Dkt. No. 84);

2. An order finally certifying the Classes as national class actions for settlement purposes only;

3. An order overruling all objections, if any, to the Settlement;

4. An order awarding the requested Service Award to Class Representative Danny Teagle;

5. An order awarding the reasonable attorneys’ fees and expenses of Class Counsel incurred in pursuing this case;

6. An order releasing the Defendant from all claims and dismissing with prejudice all claims of Class Members who did not timely exclude themselves from the Settlement;

7. An order retaining continuing jurisdiction over the settlement proceedings, to ensure the effectuation thereof in accordance with the Agreement and Final Approval Order¹; and

8. Such related orders and findings as are set forth in the Proposed Final Approval Order, served and submitted herewith.

This Motion is made, pursuant to the Agreement, on the grounds that the proposed Settlement reached by the Parties is a fair, adequate, and reasonable settlement of this action, and falls within the range of possible final approval such that dissemination of class notice is appropriate.

This Motion is based on this Notice of Motion; Memorandum of Points and Authorities; the supporting Declarations of Michael A. Caddell, Leonard A. Bennett, and Mara McRae, filed concurrently herewith; the Settlement Agreement and Exhibits attached thereto, served and filed concurrently herewith; and the complete record in this action.

¹ The Parties filed that proposed order with Plaintiff's Motion for Preliminary Approval, at Docket No. 78-8, Exhibit B.

Dated: July 19, 2013.

/s/ Michael A. Caddell
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Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE

The foregoing document complies with the typeface requirements of Local Rule 5.1C and the type style requirements of Local Rule 5.1C(3) using Times New Roman 14 point font.

/s/ Michael A. Caddell

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2013, a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following:

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/s/ Michael A. Caddell
Michael A. Caddell

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